

May 19, 2025

Mr. Jeffrey R. Gaudiosi, Esq.
Executive Secretary
Public Utilities Regulatory Authority
10 Franklin Square
New Britain, CT 06051

Re: Docket No. 24-08-08, Non-Wires Solutions Process Initiation Phase, Correspondence
Concerning the Ruling on Motion No. 15

Dear Mr. Gaudiosi:

The Connecticut Light & Power Company d/b/a Eversource Energy (“Eversource”) and The United Illuminating Company (“UI” and together the “Companies”) respectfully submit to the following correspondence to the Public Utilities Regulatory Authority (“PURA”), which concerns the PURA’s Ruling on Motion No. 15 (“Ruling”).

On May 12, 2025, the Authority issued its Ruling. Subject to certain modifications, the Ruling granted the Companies’ request for review and approval of an NWS Program Manual submitted in compliance with Order No. 3 of the Final Decision. More specifically, the Ruling directed the Companies to post a redlined version of the NWS Program Manual and its appendices to their respective NWS webpages. In this correspondence, the Companies identify two material concerns regarding the legal sufficiency of the Ruling.

First, the Ruling has been issued by PURA’s Executive Secretary, despite there being no legal basis – statutory or otherwise – that would grant the Executive Secretary the authority to issue such a ruling on behalf of PURA. While the Ruling states that it has been issued “By Direction of the Authority,” it contains no indication of whether a presiding officer is responsible for the Ruling or that all members of PURA’s commission have held and record a valid vote for the Ruling. Second, the Ruling also contains a footnote which purports to condition PURA’s direction as not “directing the EDCs to waive any legal argument or access to appellate review in a contested proceeding.” See, Ruling, FN 2. Related to this footnote, the Companies have previously raised concerns regarding the misuse of the Executive Secretary’s signature, specifically in uncontested proceedings where it has the effect of depriving the Companies of certain due process rights, including the right to appeal. See, Docket No. 25-01-20, Declaratory Ruling Regarding the Authority’s Practices and Procedures in Conducting Proceedings, Motion No. 2, FN 5.

For the avoidance of doubt, the Companies will comply with the Ruling’s directive to post the NWS Program Manual. However, due to the material concerns noted above, the Companies do so under protest.

The Companies hereby certify service of this filing upon all parties and intervenors of record in this proceeding.

Respectfully submitted,

THE CONNECTICUT LIGHT AND POWER
COMPANY D/B/A EVERSOURCE ENERGY

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